



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

MAY 24 2010

Ref: 8EPR-N

Bureau of Land Management
Salt Lake Field Office
Attention: Cindy Ledbetter
2370 South 2300 West
Salt Lake City, UT 84119

Bureau of Land Management
Fillmore Field Office
Attention: Clara Stevens
35 East 500 North
Fillmore, Utah 84631

Re: Comments on the Mona to Oquirrh
Transmission Corridor Project Final
Environmental Impact Statement
CEQ # 20100141

Dear Ms. Ledbetter and Ms. Stevens:

In accordance with our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Bureau of Land Management's (BLM) Final Environmental Impact Statement (EIS) for the Mona to Oquirrh Transmission Corridor Project and Proposed Pony Express Resource Management Plan (RMP) Amendment. The Final EIS/Proposed RMP Amendment assesses the potential impacts of a proposal to construct, operate, maintain, and decommission a double-circuit 500/345 kilovolt (kV) transmission line in northern Utah. The project includes approximately 146 miles of new transmission line and two new substations, and will require granting of a right-of-way outside of an existing utility corridor designated by BLM. Development will occur in Juab, Toole, West Jordan, and Salt Lake Counties.

EPA appreciates the response to our comments on the Draft EIS provided in Appendix H of the Final EIS/Proposed RMP Amendment. We are pleased to see the addition of background information on air quality conditions and a quantitative assessment of potential impacts to air quality has been added to address concerns regarding construction emissions of particulate matter in counties designated as nonattainment for PM₁₀. We also appreciate that BLM has added

requested regulatory information regarding construction on Superfund Sites, and initiated contact with the EPA Superfund program regarding approval to cross the Pine Canyon Conservation Area.

In our review of the Draft EIS (July 30, 2009) EPA expressed additional concerns regarding alternative selection and potential impacts to wetlands. We recommend that further steps be taken to address these concerns in the Record of Decision (ROD) for the Project.

Alternative Selection

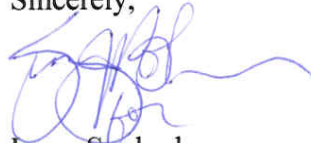
EPA continues to believe that the justification for selection of the BLM Preferred and Environmentally Preferred Alternative is unclear in the EIS. Table 2-9 presents a useful summary of relevant environmental impact data for comparison of alternatives, and Section 2.9 describes the alternative selection process in general terms. However, an accessible summary justification for the selection is not provided. As a specific example, EPA continues to feel that, based on Table 2-9, Alternative I appears environmentally preferable to Alternative H. Alternative I is ranked as first preference for Wildlife and Vegetation, and has significantly fewer acres of potential impacts to wetlands. BLM has selected Alternative H as the environmentally preferable alternative for the Limber Substation to Terminal Substation portion of the project. EPA does not believe that the Final EIS contains an explanation of the selection that makes the choice clear to the public. We recommend that BLM consider these concerns and ensure that the alternative selected in the ROD is the environmentally preferred alternative

Wetlands and Water Resources

EPA appreciates that acreages of potential wetland impacts have been quantified and included in the Final EIS. However, the method used to quantify these impacts is not clear in the document. We continue to believe that detailed information on wetland occurrence and planned use of mitigation measures is a critical component of a complete wetland impact assessment for this project. EPA acknowledges that structure and road locations must be determined prior to development of detailed location-specific mitigation plans for wetlands and waterbody crossings. We also recognize that BLM has included description of standard and selective mitigation measures to use in the case of wetland and waterbody crossings in the EIS. However, we continue to have concerns resulting from incomplete understanding of the extent to which these measures will be employed. We recommend that BLM include a commitment for mitigation of impacts to wetlands and waterbody crossings in the ROD. This commitment should clearly define what criteria will be applied to determine when the standard and selective mitigation measures described in the EIS will be applied, as well as what will trigger a need for additional mitigation, such as measures to address sediment and erosion control.

EPA appreciates the opportunity to review the Final EIS for the Mona to Oquirrh Transmission Corridor Project and Proposed Pony Express RMP Amendment. We look forward to a clarification of alternative selection and addition of mitigation commitments for wetland impacts and waterbody crossings in the ROD. If you have any questions on the comments provided in this letter, please contact me at 303-312-6004, or you may contact Molly Brodin of my staff at 303-312-6577.

Sincerely,



Larry Svoboda

Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

